

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262 (NRB) Honorable Naomi Reice Buchwald
THIS DOCUMENT RELATES TO:	
MAYOR AND CITY COUNCIL OF BALTIMORE, et al., Plaintiffs, v. CREDIT SUISSE AG, et al., Defendants.	No. 11-cv-5450 (NRB)

**DECLARATION OF GENG CHEN IN SUPPORT OF OTC PLAINTIFFS’ MOTION TO
AUTHORIZE AMENDED DISTRIBUTION OF THE BARCLAYS, CITIBANK,
DEUTSCHE BANK, AND HSBC NET SETTLEMENT FUNDS TO CLAIMANTS AND
REIMBURSEMENT OF ADDITIONAL CLAIMS ADMINISTRATION EXPENSES**

I, Geng Chen, declare as follows:

1. I am an attorney at Susman Godfrey L.L.P.
2. Susman Godfrey L.L.P. and Hausfeld LLP are Court-appointed Co-Lead Class Counsel for the Over-the-Counter Plaintiffs (“OTC Plaintiffs”) in the above-captioned action.
3. I submit this declaration in support of OTC Plaintiffs’ Motion to Authorize Amended Distribution of the Barclays, Citibank, Deutsche Bank, and HSBC Net Settlement Funds to Claimants and Reimbursement of Additional Claims Administration Expenses.

4. On November 1, 2021, Class Counsel received account statements from Huntington Bank, the Court-approved escrow agent for these settlements, for the Barclays, Citibank, Deutsche Bank, and HSBC settlement funds, which reported that, as of October 31, 2021, the Barclays settlement fund contained \$99,122,777.83, the Citibank settlement fund contained \$96,791,439.08, the Deutsche Bank settlement fund contained \$198,239,587.96, and the HSBC settlement fund contained \$82,129,811.23.

5. None of the amounts previously approved by the Court for reimbursement for costs incurred by Rust and Bates White, *see* Dkt. 3300 ¶¶ 3-4, have yet been disbursed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 1, 2021

/s/ Geng Chen
Geng Chen

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, I caused the foregoing document to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Southern District of New York, on all parties registered for CM/ECF in the above-captioned matter.

Dated: December 1, 2021

/s/ Geng Chen
Geng Chen